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16 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
17 **SAN FRANCISCO DIVISION**

18 SANDISK CORPORATION,

19 Plaintiff and  
20 Counterclaim  
Defendant,

21 v.

22 ROUND ROCK RESEARCH LLC,

23 Defendant and  
24 Counterclaim Plaintiff.

Case No. 3:11-cv-05243-RS

**DEFENDANT'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
CONFIDENTIAL EXHIBITS  
ATTACHED TO TAMIR PACKIN'S  
DECLARATION IN SUPPORT OF  
ROUND ROCK'S OPPOSITION TO  
SANDISK'S MOTION FOR LEAVE  
TO AMEND INVALIDITY  
CONTENTIONS**

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28 **DEFENDANT'S ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL CONFIDENTIAL INFORMATION ATTACHED  
TO TAMIR PACKIN'S DECLARATION IN SUPPORT OF  
ROUND ROCK'S OPPOSITION TO SANDISK'S MOTION FOR  
LEAVE TO AMEND INVALIDITY CONTENTIONS**

Case No. 3:11-cv-05243-RS

Pursuant to Local Rules 7-11 and 79-5 and General Order No. 62, Defendant and Counterclaim Plaintiff Round Rock Research LLC (“Round Rock”) submits this administrative motion for an order to seal certain exhibits attached to the Declaration of Tamir Packin in Support of Round Rock’s Opposition to SanDisk’s Motion to Amend Invalidity Contentions (the “Packin Declaration”), dated July 5, 2013.

Round Rock seeks permission to file under seal because exhibits I and J to the Packin Declaration are documents that Plaintiff and Counterclaim Defendant SanDisk Corporation (“SanDisk”) has designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Modified Stipulated Protective Order (“Protective Order”) (Dkt. No. 117).

### **ARGUMENT**

Exhibit I to the Packin Declaration is excerpts from a document produced by SanDisk in this litigation that SanDisk designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order. (Decl. of Tamir Packin filed in support of this Administrative Motion, ¶3.) Exhibit J to the Packin Declaration is a document produced by SanDisk in this litigation that SanDisk designated as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order. (Decl. of Tamir Packin filed in support of this Administrative Motion, ¶4.) Pursuant to Local Rule 79-5(d), Round Rock is filing this administrative motion to give SanDisk the opportunity to file a declaration establishing that such designated material is sealable and to file a proposed sealing order.

1 Dated: July 5, 2013

Respectfully submitted,

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16 By: /s/ Bradford J. Black

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